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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

John Doe
also known as

Defendant.

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COMPLAINT AND AFFIDAVIT IN SUPPORT OF ARREST WARRANT

(T. 18, U.S.C., § 1349)

13 MJ 01117

TOMLINSON, M

EASTERN DISTRICT OF NEW YORK, SS:

EDWARD A. PANETTA, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

In or about and between February 2013, and the present within the Eastern District of New York and elsewhere, the defendant also known as together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349)

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IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
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LONG ISLAND OFFICE

The source of my information and grounds for my beliefs are as follows:

1. I have been a Special Agent with the FBI for approximately seven years, and I am currently assigned to the Long Island Resident Agency ("LIRA"). In this assignment, I have conducted physical surveillance, interviewed witnesses, reviewed extensive documents obtained through the service of subpoenas, and used other investigative techniques to secure relevant information for use in criminal prosecutions.

2. My knowledge of the information set forth in this affidavit is based upon my personal participation in this investigation and in other investigations of financial fraud perpetrated; my review of records and reports; my review of recorded conversations; my discussions with witnesses and victims; my discussions with other law enforcement agents involved in this investigation and similar investigations; my discussions with and review of information provided by financial institutions; and my law enforcement experience and training.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause to support the issuance of an arrest warrant, it does not include all of the facts I have learned during the course of this investigation. Where actions, conversations and statements of others are reported in this

affidavit, they are reported in substance and in part unless otherwise indicated.

I. BACKGROUND

4. There is a computer services contractor corporation ("the Contractor") located in Falls Church, Virginia that is in the business of providing contract employees qualified in computer systems to various businesses across the United States.

5. There is a government defense contractor ("GDC") located in Tucson, Arizona that has a contract with the Contractor whereby the Contractor provides computer system analysts to the GDC.

6. On March 5, 2013 the Contractor hired Co-conspirator-1 (CC-1) as a computer programmer based on his qualifications as listed in his resume. Despite the fact that CC-1 claimed to have previously worked as a computer programmer and to have the computer skills required to perform that function, he had not in fact previously worked as a computer programmer nor did he possess the requisite skill set.

7. On or about March 18, 2013, CC-1 was assigned to work at the GDC in Tucson, Arizona by the Contractor.

II. THE FRAUD

8. Since approximately February 2013, the FBI has been conducting an investigation regarding the submission of false resumes to the Contractor from individuals located on Long Island and, specifically, those individuals that were placed by the Contractor at the GDC.

9. The investigation has revealed that the defendant also known as together with others, conspired to place an unqualified individual in a position at the Contractor. Specifically, , together with others, including Co-conspirator-2 ("CC-2"), assisted CC-1 in creating a fraudulent resume to make it appear that CC-1 was qualified for a computer programmer position at the Contractor. In return, CC-1 was required to send a portion of the salary he earned at the Contractor by wire to CC-2.

10. This investigation also revealed that the defendant assisted CC-1 in creating the fraudulent resume. Specifically, listed a company named Malikans Inc. as CC-1's most recent employer and stated that CC-1's supervisor was himself, using his alias . As and CC-1 were both aware, CC-1 had not in fact worked for company Malikans. CC-1's resume also stated that he had earned an annual salary of

$95,000 working for Malikans, which both CC-1 and knew to be false.

11. On his resume, CC-1 further listed a different former employer and falsely stated that he had worked as a book keeper for that employer. This employment entry falsely listed CC-2 as CC-1's supervisor, when CC-1 and CC-2 well knew that CC-1 had not in fact been supervised by CC-2.

12. CC-1 was interviewed by the FBI on December 12, 2013, regarding his involvement and knowledge of the fraudulent scheme described above. CC-1 provided the following information:

13. CC-1 admitted his guilt regarding the submission of a false resume to the Contractor in order to obtain employment. CC-1 further admitted that he submitted the resume via the internet from Valley Stream, New York and sent it to the Contractor in Falls Church, Virginia. CC-1 admitted that he had agreed with the defendant and CC-2 to engage in the fraudulent scheme. Specifically, CC-1 stated that while his resume listed and CC-2 as his former supervisors, those two individuals had never in fact supervised CC-1. CC-1 further stated that CC-1 and CC-2 had all agreed to list and CC-2 as CC-1's former supervisors in the event the Contractor attempted to verify the employment. CC-1 admitted that he had never worked at Malikans Inc. and that he was never a book keeper for the other former employer he listed on his resume. CC-1 also admitted that he did not have the computer

literacy skills that he claimed to have on his resume and to have gained during his experience working for at Malikans. CC-1 stated that in order to cover up his lack of experience during the interview process, CC-2 pretended to be CC-1 during a follow up telephone interview with the Contractor in February 2013. CC-2, pretending to be CC-1, answered the technical questions posed by the Contractor hiring employee during the interview.

14. Based on the fraudulent resume CC-1 submitted with the assistance of the defendant and CC-2, CC-1 was hired as a contract employee by the Contractor and assigned to RMS on March 18, 2013. His annual salary was approximately $95,000. As a part of the scheme, CC-1 was required to wire approximately 15% of his annual salary to CC-2. It was CC-1's understanding that a portion of the money was then given to

15. A review of bank records indicate that CC-1 wired money through the use of interstate wires to the bank account belonging to CC-2 on a monthly basis beginning in April 2013.

16. On December 12, 2013, CC-1 placed a telephone call to the defendant stating that he had been interviewed by the FBI and that the FBI might be calling to confirm the information that was listed on the fraudulent resume. agreed to falsely verify the information on the resume in the event the FBI attempted to contact him. Later on December 12, 2013, the FBI placed a telephone call to regarding his purported supervision

of CC-1 while working at Malikans Inc. During the call in order to continue the fraud, lied and stated that CC-1 had in fact worked for him during the time period listed on CC-1's resume and that CC-1 had in fact earned the annual salary listed on CC-1's resume during that period. As noted above, CC-1 has admitted that those facts are false. Furthermore, on the phone call, described CC-1 as "hard working and trustworthy."

17. Both aforementioned calls from December 12, 2013 were recorded by the FBI.

18. The investigation has further revealed that the defendant and CC-2 helped other individuals besides CC-1 falsely burnish their resume credentials in order to attempt to fraudulently gain employment at the Contractor.

WHEREFORE, I respectfully request that an arrest warrant be issued so that the defendant also known as can be dealt with according to law.

Edward A. Panetta
Special Agent
Federal Bureau of Investigation

Sworn to before me this
21st day of December, 2013

VIKTOR V. POHORELSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK